

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss. MALDEN DISTRICT COURT
C.A. NO.

TABATHA SENIBALDI,
Plaintiff,
v.
TARGET CORPORATION,
Defendant.

COMPLAINT AND DEMAND FOR JURY TRIAL

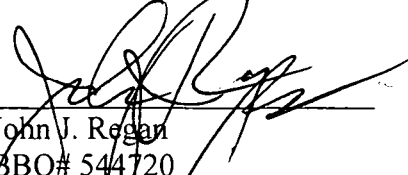
1. The plaintiff, Tabatha Senibaldi (“SENIBALDI”) is an adult individual, residing in Revere, Massachusetts.
2. The defendant, Target Corporation (“TARGET”) is a Minnesota corporation with a usual place of business at or near Mystic View Road, Everett, Middlesex County, Massachusetts (“the PREMISES”).
3. At all times relevant to this Complaint, including on or about January 17, 2020, TARGET owned, controlled, managed, operated and was legally responsible for the condition of a department store on the PREMISES.
4. At all times relevant to this Complaint, including on or about January 17, 2020, SENIBALDI was in the exercise of all due care to ensure her own safety and the safety of others.
5. On or about January 17, 2020, SENIBALDI was on the PREMISES as a customer and business invitee of TARGET.
6. At all times relevant to this Complaint, including on or about January 17, 2020, there were hazards, defects and conditions on the PREMISES, including foreign substances and liquids on the floor in the vicinity of the check out counters, which rendered the PREMISES unreasonably hazardous and dangerous (“the HAZARDS”).
7. At all times relevant to this Complaint, including on or about January 17, 2020, TARGET knew or should have known of the HAZARDS and negligently failed to remedy and/or warn of same.
8. On or about January 17, 2020, by reason and means of the HAZARDS, SENIBALDI was caused to fall on the PREMISES.
9. As a direct, proximate and foreseeable result of said accident on January 17, 2020, SENIBALDI suffered, continues to suffer, and will suffer in the future, personal injuries

causing her to endure continued medical care and treatment; emotional and physical pain and suffering; medical expenses; and loss of enjoyment of life.

WHEREFORE, the plaintiff, Tabatha Senibaldi demands that that this Court enter judgment in her favor against the defendant, Target Corporation in a sum which fairly and adequately compensates for the plaintiff's injuries and damages, including costs of this action, a reasonable attorneys' fee and such other relief as this Court may deem just.

THE PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL COUNTS AND CLAIMS.

By Her Attorney,



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